

## REMARKS

In the allowed parent case (U.S. Patent Application No. 09/391,558), the following references were used to reject certain claims in that case: Kitamura et al. (USPN 6,188,871); Goodman (USPN 6,243,446); Watson, Jr. et al. (USPN 5,812,928); Mihara et al. (USPN 5,481,757); Williams (USPN 5,847,660); and Koperda (USPN 5,790,806).

All of the originally-filed claims 1-20 have been cancelled. New claims 21-43 have been added.

New claims 21, 31, and 34 are believed to be patentable because of the unique distributed architecture that includes a headend, a plurality of service modules associated with the headend, and a plurality of interface units associated with each service module, each interface unit providing a video channel to a video displaying apparatus. Particularly, each service module includes a plurality of receiver/decoders that each receive the same multiplexed channels signals from the headend and receive/decode therefrom a selected video channel that is provided at a selected output frequency that is unrelated to the conventional cable frequency normally associated with the selected video channel. Dependent claims 22-30, 32, 33, and 35-43 contain further distinguishing limitations.

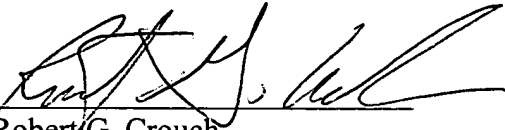
Kitamura, Goodman, and Watson do not include each of these features alone or in combination. Kitamura uses frequency converters and does not have exactly one converter for each set-top-converter of a subscriber, instead having a converter for each incoming video channel and then utilizing a large and expensive cross-point switch. Goodman does not include a cable distribution system remotely like the claimed invention and is potentially relevant only to disclose transmitting video signals at baseband. Watson is closer in architecture but is deficient in that several of his architectural details are significantly different. For example, in Watson's Channel Access Controller (which might arguably be considered analogous to the claimed service module), the selected video channel is converted to a high UHF frequency and then returned to its conventional cable frequency for passage to the subscriber. Thus, the frequency of the video channel that Watson sends to a given subscriber will change when the subscriber selects a different channel. The claimed invention, on the other hand, sends any video channel selected by a particular subscriber on a fixed, predetermined frequency that is unrelated to the

conventional cable frequency. Arguments as to the motivation to combine and how one would combine the teachings of these references are reserved for a later time, should it become necessary.

Based upon the foregoing, Applicants believe that all pending claims are in condition for allowance and such disposition is respectfully requested. Since it may be possible that a telephone conversation could further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned should it be at all helpful.

Respectfully submitted,

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